



KENDRICK R. RIGGS

DIRECT DIAL 502-560-4222

DIRECT FAX 502-627-8722

kriggs@ogdenlaw.com

1700 PNC PLAZA  
500 WEST JEFFERSON STREET  
LOUISVILLE, KENTUCKY 40202-2874  
(502) 582-1601  
FAX (502) 581-9564  
www.ogdenlaw.com

December 20, 2005

RECEIVED

DEC 21 2005

PUBLIC SERVICE  
COMMISSION

Elizabeth O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

RE: *The Plan of Kentucky Utilities Company for the VDT Surcredit Mechanism*  
KPSC Case No. 2005-00351

*The Plan of Louisville Gas and Electric Company for the VDT Surcredit Mechanisms*  
KPSC Case No. 2005-00352

Dear Ms. O'Donnell:

Enclosed please find and accept for filing two originals and ten copies of Louisville Gas and Electric Company's and Kentucky Utilities Company's Data Requests to the Office of Attorney General the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions or need any additional information, please contact me at your convenience.

Very truly yours,

Kendrick R. Riggs

KRR/ec  
Enclosures  
cc: Parties of Record (w/encl)

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

DEC 21 2005

In the Matter of:

PUBLIC SERVICE  
COMMISSION

THE PLAN OF KENTUCKY UTILITIES )  
COMPANY FOR THE VALUE DELIVERY ) CASE NO. 2005-00351  
SURCREDIT MECHANISM )

In the Matter of:

THE PLAN OF LOUISVILLE GAS AND )  
ELECTRIC COMPANY FOR THE VALUE ) CASE NO. 2005-00352  
DELIVERY SURCREDIT MECHANISM )

**DATA REQUESTS OF  
KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY  
TO THE OFFICE OF ATTORNEY GENERAL**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively the “Companies”) respectfully submit the following data requests to the Attorney General, by and through his Office of Rate Intervention, (“AG”) to be answered by the date specified in the Kentucky Public Service Commission’s (“Commission”) procedural schedule order herein.

**Instructions**

As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to the AG, his witnesses or counsel.

A. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if the AG receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

C. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

E. If the AG has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for the Companies as soon as possible.

F. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

G. In the event any document requested has been destroyed or transferred beyond the control of the AG or any of his witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer the Companies to the record where the document is located.

### Data Requests

1. Please confirm that the prior regulatory experiences of Mr. Henkes, as set forth in Appendix I to his testimony, do not include any engagement with the Office of the Attorney General for Kentucky in the following cases:

- (a) Annual Earnings Sharing Mechanism Filing of Louisville Gas & Electric Company, Case No. 2001-054 before the Kentucky Public Service Commission;
- (b) Annual Earnings Sharing Mechanism Filing of Kentucky Utilities Company, Case No. 2001-055 before the Kentucky Public Service Commission;
- (c) An Investigation Pursuant to KRS 278.260 of the Earnings Sharing Mechanism Tariff of Kentucky Utilities Company, Case No. 2003-00334 before the Kentucky Public Service Commission; and
- (d) An Investigation Pursuant to KRS 278.260 of the Earnings Sharing Mechanism Tariff of Louisville Gas and Electric Company, Case No. 2003-00335 before the Kentucky Public Service Commission.

2. Please identify any prior regulatory experiences of Mr. Henkes which concern, refer or relate to surcharge or surcredit rate mechanisms.

3. For any regulatory experience described in the response to the preceding question, please provide a complete and accurate copy of any testimony associated with that experience.

Dated: December 20, 2005

Respectfully submitted,



Kendrick R. Riggs  
OGDEN NEWELL & WELCH PLLC  
1700 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202  
Telephone: (502) 582-1601

Elizabeth L. Cocanougher  
Senior Corporate Attorney  
E.ON U.S. LLC  
220 West Main Street  
Post Office Box 32010  
Louisville, Kentucky 40232  
Telephone: (502) 627-4850

Counsel for Louisville Gas and Electric  
Company and Kentucky Utilities Company

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Data Requests were served on the following persons on the 20th day of December 2005, via U.S. mail, postage prepaid:

Elizabeth E. Blackford  
Assistant Attorney General  
Office of the Attorney General  
Office of Rate Intervention  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204

David F. Boehm  
Michael L. Kurtz  
Boehm Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202

  
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Counsel for Louisville Gas and Electric  
Company and Kentucky Utilities Company